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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
800 Data Base Access Tariffs and	)	CC Docket No. 93-129
the 800 Service Management System	)	
Tariff	)	
	)	

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COMMENTS OF
SPRINT COMMUNICATIONS COMPANY LP

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April 15, 1994

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Summary

The direct cases and the supplemental information filed by the BOCs and GTE in the 800 database investigation are seriously deficient and still fail to demonstrate the reasonableness of the rates and some of the terms and conditions governing their provision of interstate 800 database access service. Confusion and inconsistencies regarding the definition of basic area of service (AOS) routing and the basis on which the query charge is assessed (delivered or undelivered calls) remain. These carriers have also failed to demonstrate that exogenous cost treatment for various of their claimed expenses is warranted, and continue to use understated demand quantities. Finally, virtually no additional data were provided to show that the SMS/800 tariffed rates are just and reasonable.

Because the BOCs and GTE have failed to make the necessary showing here, the Commission should require them to decrease their rates to reflect the removal of various costs from the exogenous cost category and use of appropriate demand quantities. Certain of the BOCs and GTE should also revise their tariffs to specify that AOS routing at the NPA/NXX level or larger is basic, and that the 800 database query charge will be assessed per delivered call. In addition, Bellcore should analyze SMS/800 rates using actual operating results and adjust these rates as necessary to remove any "profits" which Bellcore states the rates were not intended to generate.

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COMMENTS

Sprint Communications Company LP hereby respectfully submits its comments on the direct cases filed on September 20, 1993, and the supplements to the direct cases filed on March 15, 1994, by the LECs in the above-captioned proceeding. For the most part, the LECs have provided virtually no new information in their direct cases, and instead refer to or repeat what they said in their replies to petitions against their 800 database tariffs.[1] As is clear from its decision to institute the instant investigation,[2] the Commission obviously felt that the LECs' replies were insufficient. Most of the information provided in the direct cases and supplements is either not useful or raises further questions about the

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[1] Indeed, US West even states (p.1) that "[b]ecause no one has even attempted to refute [US West's Reply to Petitions against its 800 database tariff], no purpose would be served by US West repeating that demonstration here."

[2] 800 Data Base Access Tariffs and the 800 Service Management System Tariff, CC Docket No. 93-129, Order Designating Issues for Investigation, released July 19, 1993 (DA 93-930) ("Designation Order").

validity of the LECs' cost data and their ratemaking methodologies. Because the LECs have again failed to demonstrate the reasonableness of the rates and some of the terms and conditions governing provision of interstate 800 database access service, the Commission should require the LECs to amend their tariffs as discussed below.

I. CERTAIN TERMS AND CONDITIONS REMAIN UNCLEAR OR UNREASONABLE.

A. Basic Area of Service Screening

In their direct cases, four BOCs (Ameritech, Nynex, Pacific, and SWB) clarify that they will treat as basic 800 query service all area of service (AOS) routing based on an NPA-NXX area or larger (e.g., by NPA, LATA or total US).[3] Presumably, for these BOCs, only routing by NPA-NXX-XXXX will entail use of a vertical feature. Bell Atlantic and GTE state that a basic query includes AOS routing only down to the LATA level. BellSouth provides no further clarification as to what it considers basic area of service routing. It simply states (Exhibit 1, p. 1) that it "will deliver each call based on routing information associated with the 800 number"; its tariff (Section 6.1.1(E)) is similarly opaque, stating that the call will be delivered "based on the dialed ten digit number."

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[3] US West stated in its reply to petitions against its 800 tariff that it considers routing by state, LATA, NPA, or NPA-NXX to be included as basic carrier identification service, and that only routing by the originating telephone number will involve a vertical feature.

All of the BOCs should treat as basic those calls whose routing is based upon the originating NPA-NXX or larger area (i.e., allow the customer to divide the traffic to a single 800 number among two or more IXCs geographically, based on the NPA-NXX in which the calls originate, without incurring vertical feature charges). As Sprint and other 800 database customers have stated (see, e.g., Sprint Petition to Investigate 800 database tariffs, pp. 3-5), consistency in the definition of basic area of service routing will facilitate IXCs' ability to provide seamless nationwide 800 service. Moreover, as Ameritech points out (p. 2), the resporg can enter either a LATA code or NPA-NXX codes into the SMS, and since "[n]either SMS/800 nor the SCP is able to distinguish an instruction entered for a single NPA-NXX from multiple instructions intended to cover an entire LATA's traffic....Ameritech must treat both situations as basic." Since there is no reason why this should not also be the case for other LECs, a consistent definition of basic AOS routing is readily achievable.

B. Basis of Query Charge Assessment

The Commission has requested additional information on petitioners' concerns about the lack of uniformity in LEC tariffs as to when the query charge is assessed (Designation Order, para. 6). The direct cases make it clear that LEC tariffs are not consistent on this point. Bell Atlantic (p. 2) and SWB (p. 2) state that they will assess the query charge only when the call is delivered to the IXC. In contrast, Ameritech (p. 3), BellSouth (p. 2), Nynex (p. 4), Pacific (p.

3) and GTE (p. 2) state that they will assess the query charge even if the associated call is not delivered to the IXC.

This issue also is the subject of a pending petition for reconsideration filed by MCI in CC Docket No. 86-10. MCI urged that LECs be required to assess the query charge only for delivered calls because nondelivered calls do not benefit the IXC, and because it is impossible for the IXC to audit charges assessed on the basis of nondelivered calls. In deriving their query rates, the LECs could easily include a factor for nondelivered calls so that they are not forced to absorb the costs themselves or to recover them from other ratepayers. Thus, from both a policy and practical perspective, it is in the public interest for LECs to assess the query charge based on delivered calls.

II. CLAIMED EXOGENOUS COSTS ARE EXCESSIVE.

One of the most serious areas of debate in the 800 database tariff proceeding has been what costs may reasonably be considered exogenous. The direct cases of the BOCs and GTE do little, if anything, to justify exogenous cost treatment for certain of their claimed expenses. Because these LECs have failed to demonstrate that the costs at issue here were "incurred specifically for the implementation of basic 800 database service" (Provision of Access for 800 Service, 8 FCC Rcd 907, 911 (1993)), their 800 database access rates should be adjusted downward to reflect the removal of costs which had been provisionally (*i.e.*, subject to this investigation) granted exogenous cost treatment.

The BOCs' and GTE's justification for their claimed exogenous costs is deficient in several respects. First, there is wide variation in the types of costs for which exogenous cost treatment is requested, as well as in the jurisdictional allocation of claimed exogenous costs. Second, several of these LECs remain unable to identify or otherwise justify claimed costs. Third, at least three BOCs (Bell Atlantic, Ameritech and Nynex) fail to demonstrate the reasonableness of overhead costs included in their 800 database rates. Fourth, at least two BOCs, Pacific and SWB, have mismatched expenses and demand, resulting in excessively high query rates. Each of these is discussed below.

A. Discrepancies and Variations Among the BOCs

There continues to be substantial divergence of opinion even among the BOCs as to what costs are truly exogenous. As seen in Table 1 below, there are at least two BOCs which do not request exogenous cost treatment in five of the six investment categories about which the Commission sought additional information.[4] Indeed, SWB requests exogenous cost treatment only for SCP and SSP costs. If the investment costs for these categories were truly exogenous, it is difficult to understand this lack of unanimity among the BOCs.

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[4]The exception is SCP costs, which all of the BOCs consider exogenous.

Table 1
Basic Query Unit Cost

	STP/SCP Link	LSTP/RSTP Link	SCP/SMS Link	Tandem Switch	SSP	SCP
AOC	$.000005	None	None	None	$.001349	$.001042
BA	.001210	.000547	.000026	None	None	.001306
BS*	30,580	43,355	19,949	None	424,730	830,546
NYT	.000072	.000487	None	None	None	.000926
NET	.000143	.000365	None	None	None	.000487
Pacific	None	None	.000771	.002493	.000589	.001496
SWB	None	None	None	None	.001166	.000909
US West	.000049	None	None	.001322	.001000	.001318

Note: Table 1 is based on data in the BOCs' original direct cases.
* BellSouth's data are apparently not in unit cost format.

There is a similar lack of consistency in the BOCs' jurisdictional allocation of investment used to support the basic query rate. As seen in Table 2 below, in many cases the data were not provided. However, what information was provided shows that there are extremely wide variations among the BOCs in the interstate 800 database service allocation of total company investment for the six categories listed. For example, Bell Atlantic allocates 82% of its LSTP/RSTP signaling link investment to interstate 800 database access, while Ameritech, Pacific and SWB allocate none (the other three BOCs fail to provide any jurisdictional information); interstate SCP investment allocation ranges from 13% (Ameritech) to 82% (Bell Atlantic). Although some differences in the BOCs' interstate allocation percentages are to be expected, variations of the magnitude seen here raise questions as to the reasonableness of the BOCs' jurisdictional allocation process as well as their underlying data.

Table 2
Basic Query Investment Allocated
to Interstate 800 Database

	STP/SCP Link	LSTP/RSTP Link	SCP/SMS Link	Tandem Switch	SSP	SCP
AOC	23.50%	None	None	None	14.29%	13.21%
BA	81.96	81.96	None	None	None	81.96
BS	18.86	19.23	None	None	None	17.66
NYT	N/A	N/A	None	None	None	N/A
NET	N/A	N/A	None	None	None	N/A
Pacific	None	None	49.00	49.00	49.00	49.00%
SWB	None	None	None	None	25.44	20.86*
US West	N/A	N/A	N/A	N/A	N/A	N/A

Note: Table 2 is based on data in the BOCs' original direct cases.

* SWB's "total company" SCP investment exceeds its "total investment" figure. The 20.86% figure is based on the lower "total investment" figure.

B. Inability to Justify Claimed "Exogenous" Costs

Rather than demonstrating the reasonableness of their 800 database rates, the LECs' direct cases simply make clear their inability to identify and justify "exogenous" 800 service costs. For example, Ameritech acknowledges that it is "unable to identify the 800 Database Service specific software costs" associated with SSP switch upgrades (Attachment I, p. 3). Since its agreements with its three largest switch vendors "include[] generic upgrades as well as hundreds of optional features....an allocation of costs to a specific feature or function would be arbitrary and capricious" (id., p. 4). Given Ameritech's inability to identify the costs of equipping a switch with SSP capability, the Commission should deny Ameritech's request that these costs be granted exogenous cost treatment. Because the carrier itself lacks firm information, there is no way to ascertain whether the costs (and thus the rates) are just and reasonable.

Ameritech also states that signaling processing costs for 800 queries should be treated exogenously because investment capacity associated with this capability is exhaustible (id., p. 4). However, all capacity is exhaustible, and since signaling processing "is a function of any SS7 call" (id.), it is not clear that it is 800 service (rather than some other SS7-based service) which might necessitate installation of incremental capacity. Ameritech does not explain how much capacity is required for 800 database service; whether additional capacity (e.g., a new switch) is in fact necessitated by implementation of 800 database service; or what percentage of total additional capacity costs would be allocated to 800 database service. Here again, Ameritech has failed to adequately justify recovery of additional capacity costs from 800 service customers directly rather than from its general (endogenous) SS7 network upgrade budget.

Bell Atlantic similarly fails to justify all of its exogenous costs. For example, it states (p. 4) that "in order to provide customers with the same level of service with data base access that they enjoyed with NXX access, it was necessary for Bell Atlantic to establish a specialized 800 repair center." It remains unclear exactly what "specialized" repair services this center provides, why existing facilities were inadequate, whether consolidation of repair functions actually resulted in cost savings, or whether the repair center also handles other 800 service-related functions (such as Bell Atlantic's resporg duties). No attempt was made to quantify the different level of effort or resources necessary to handle

NXX versus 800 database trouble reports. In any event, since customer service is an endogenous expense, Bell Atlantic's request for exogenous treatment of this item should be denied.

Both BellSouth and GTE include as exogenous certain NASC SMS costs. BellSouth claims $279,182 in costs related to its role as a resporg (Exhibit 3, p. 1), and GTE includes expenses relating to "the hardware required to access and query the SMS data base and the monthly allocated Bellcore charges for record search and reservation, the dial-up 9.6 dedicated SP, the network, downloading, the data base, logon and reporting" (p. 8)--at least some of which appear to relate to GTE's role as a resporg rather than a SCP owner/operator. To the extent that any resporg expenses have been included in BellSouth's and GTE's 800 data base query or vertical features charges, they should be disallowed. Purchasers of BellSouth's and GTE's interLATA 800 database access services, most of whom are unlikely to use the LEC as their resporg, should not be required to contribute to the payment of the LEC's resporg expenses.

BellSouth's remaining discussion of exogenous cost (Exhibit 3, pp. 2-3) is limited to a description of the types of costs for which it requests exogenous cost treatment. It makes no attempt to justify such treatment, and thus interested parties have little basis for evaluating whether BellSouth's claims are warranted.

Pacific's discussion of its claimed exogenous costs is similarly vague. For example, it states (p. 10) that tandem upgrades should be treated exogenously because "those costs were only expended to meet the Commission's 1993 access time standards." This is hardly a justification. The Commission had directed the LECs to provide additional information on this very point (Designation Order, para. 27), and Pacific, instead of meeting this requirement, simply repeats itself. Pacific's request for exogenous treatment for these costs should therefore be denied.

C. Inclusion of Overhead Expenses

There is a divergence of opinion among the BOCs as to whether overhead costs should be treated exogenously. At least one BOC, Bell Atlantic, continues to explicitly seek such relief. However, contrary to the clear dictates of the Designation Order (para. 26), Bell Atlantic still has not made the kind of showing necessary to justify exogenous cost treatment for overhead costs. It continues to assert that virtually all of the costs associated with providing 800 database service should be given exogenous cost treatment, but does no more than state that "additional investment was required to implement 800 Data Base Access Service, and with any new investment, overhead supporting that investment is required" (Appendix B, p. 3). The showing required by the Commission's Designation Order is not attempted; Bell Atlantic does not even identify what overhead costs were incurred when it ostensibly deployed new 800 service investment.

Bell Atlantic further asserts that its overhead costs warrant exogenous cost treatment because the "extraordinary activities" of implementing 800 database service--such as travel and lodging expenses for employees attending industry fora meetings, training, education and methods development costs, and extended testing--"significantly exceeded the overhead costs associated with a typical service" (id.). All of these expenses should be considered endogenous. Just as the costs of accelerating SS7 deployment to meet the 800 database implementation deadline were not granted exogenous cost treatment, so too should the (unspecified) costs of the "intense" efforts of meeting deployment deadlines be denied exogenous cost treatment. Moreover, because Bell Atlantic retains substantial control over these types of expenses, endogenous treatment is warranted.[5]

Two other BOCs, Ameritech and Nynex, state that they are no longer seeking exogenous treatment for overhead costs (Ameritech Attachment I, p. 4; Nynex, p. 9, n. 17). However, the tables containing unit cost and investment data show overhead loadings included for each of the categories for which these BOCs are seeking exogenous treatment. These overhead loadings account for a significant percentage of the estimated total unit cost.[6] If Ameritech and Nynex are in

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[5]The Commission has stated that exogenous costs arise "for reasons wholly beyond [price cap LECs'] control, ... [as] distinguished from ongoing costs that may change with the nature and magnitude of business operations" (Policy and Rules Concerning Rates for Dominant Carriers, 3 FCC Rcd 3195, 3413 (para. 397) (1988)). The Commission has also rejected the proposal that all uncontrollable "extraordinary" costs--such as those resulting from a natural disaster--should be treated exogenously.

[6]Overhead loadings as a percent of total unit cost are:

AOC	NYT	NET

(Footnote Continued)

fact seeking exogenous cost treatment for these costs, they should have provided the additional information required by the Designation Order. Since they have not provided such information, their rates should be reduced by the amount of any overhead loadings included in the rate development process.

D. Mismatch of Demand and Costs

At least two BOCs, Pacific and SWB, have employed a ratemaking process under which purported exogenous costs from one period are divided by demand from a different period. SWB summed SSP and SCP costs incurred or estimated to be incurred between 1991-1994, and even increased 1991 and 1992 expenditures by a present value factor (11.25 percent) to bring them to 1993 dollars.[7] It then divided total exogenous costs by base period (1991) 800 queries to obtain the 800 query rate (p. 15). Pacific similarly divided 1992 exogenous costs by 1991 demand (p. 14).

It makes no sense here to use demand and costs from different time periods. To the extent that demand for 800 database queries was higher in 1992 (and beyond) than it was in 1991, a mismatch in expenses and demand results in an excessively high query rate. Pacific and SWB should therefore

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(Footnote Continued)

STP/SCP signaling link	42%	35%	29%
SCP	27%	35%	29%
SSP	41%	N/A	N/A
LSTP/RSTP signaling link	N/A	35%	29%

[7] See SWB Direct Case, pp. 17-19. SWB did not, however, discount forecasted 1994 SCP expenditures to 1993 dollars.

be directed to recompute their query rates using cost and demand estimates from consistent time periods.

Pacific argues that its methodology is correct because it complies with the price cap rules for restructured services (Section 61.47), which require that base period demand quantities be used. However, 800 database access service is a hybrid: although the Commission classified it as a restructured service, it also allowed exogenous cost treatment for certain expenses. (In a pure service restructure there are no exogenous costs.) Given the mixed treatment of 800 database access service under price cap regulation, application of Section 61.47 of the rules without consideration of other relevant factors is misplaced.

III. DEMAND IS UNDERSTATED.

Various of the LECs appear to have understated demand. While little new information on demand forecasts has been provided in the direct cases and the supplements, these filings confirm that the demand assumptions of various of the LECs are overly conservative.

At least two LECs--BellSouth and GTE--assume that introduction of 800 database service and the resulting availability of 800 number portability will not result in any additional 800 service demand stimulation.[8] This assumption is obviously

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[8] See BellSouth, Exhibit 3, p. 1 (introduction of 800 database service will not "affect the total growth rate of 800 query demand"); and GTE, p. 13 (800 number portability will (Footnote Continued)

unrealistic. While it is true that 800 database service promotes customer migration between carriers, it also stimulates overall 800 usage, for example through increased advertising and sales efforts by IXCs, new 800 service and promotional offerings, and general publicity about 800 number portability. BellSouth's and GTE's demand quantities are therefore likely to be significantly understated, causing the access rates to be excessively high since they were computed by dividing total exogenous costs by forecasted 800 database queries. The query rates of these LECs should be adjusted downwards to reflect more appropriate demand quantities.

Moreover, GTE's five-year forecast of 800 queries, which was based on "historical 800 call growth rates and commonly accepted forecasting models" (p. 11), shows an average growth rate over that period of only 10% (id.). A growth rate of 10% per year for 800 service is very modest, and the basis for this forecast remains unclear. GTE should be required to provide additional information to demonstrate that its demand forecast, based on historical growth, is reasonable.

Nynex's demand forecast also appears to be too conservative. It used a levelized five-year demand forcast based on an average growth rate of 15 percent, even though the average growth rate from 1989-92 was 20 percent, citing a poor economy in the Northeast and the fact that 800 service is "mature" (p.

(Footnote Continued)
not "stimulate additional end user usage since new end user services or benefits are not expected").

10). However, as noted above, the advent of 800 number portability and the many new features and functions which 800 service providers are now offering should stimulate demand. Further, it is conceivable that during economic downturns, customers make more intensive use of telecommunications services rather than more expensive forms of interaction such as travel.

In any event, it is now almost a year since 800 number portability first became available, and there should be actual demand data against which the LECs' forecasts can be compared. A comparison of actual and forecasted demand quantities would help the Commission and other interested parties to evaluate the reasonableness of the LECs' ratemaking methodologies.

IV. THE SUPPLEMENTAL DATA ARE DEFICIENT.

On March 15, 1994, the LECs submitted revised cost support which purports to demonstrate the validity of the originally filed 800 service costs. However, these submissions, like the original tariff filings, are still fraught with deficiencies. For example:

- Ameritech states that it was "unable to manually determine the additional costs associated with a vertical query over a basic query" (p. 2). Ameritech "therefore chose to make its best guess about the incremental resources consumed by a vertical query, and ten percent (10%) seemed reasonable." Ameritech does not explain in even the broadest terms the basis for its "guess," and meaningful review is therefore impossible. Ratemaking by guesswork hardly inspires confidence in the reasonableness of the proposed rates.

- Bell Atlantic states (p. 2) that its supplemental data "justify a basic query rate 35% higher than the currently effective rate, and a vertical feature package charge more than 600% higher than the effective rate." For example, claimed exogenous unit costs for the SCP/SMS signaling link increased by over 2300% under Bell Atlantic's revised methodology. Such assertions are hard to credit. The huge variances in claimed costs only highlight the apparently arbitrary nature of Bell Atlantic's ratemaking process.

- US West claims that alternate methods of determining exogenous costs for 800 database service results in exogenous costs of $8.88 million--almost 14% higher than the originally claimed amount (p. 2). As is true for Bell Atlantic's supplemental data, the substantial increase in claimed costs points out the apparent deficiencies in US West's ratemaking methodology.

In most cases, the supplemental data provided were of little or no use. However, Nynex did provide supplemental information which demonstrates the degree to which originally claimed exogenous costs were overstated. In its Direct Case (p. 8), Nynex stated that its exogenous costs were $5,880,385. It now estimates exogenous costs at $2,136,983 (March 15 Supplement, p. 1). The latter figure was estimated without the use of the CCSCIS model--the best evidence thus far provided of the apparently arbitrary formulae and data contained in the still undisclosed CCSCIS model.[9]

V. BELLCORE SHOULD DETERMINE WHETHER RATES IN THE SMS/800 TARIFF GENERATE A "PROFIT" OR A "LOSS."

The Commission has directed the BOCs to provide additional information to justify the rates in the SMS/800 tariff (Designation Order, Appendix C, paras. 12-13). While little new information was provided by the BOCs to support the SMS/800 rates (most if not all of the information apparently was filed as part of earlier tariff filings), the debate over the forecasts can now be resolved on the basis of actual operating information. Based on this actual data, it is likely that some of the SMS/800 rates are excessive.

For example, it is Sprint's understanding that demand for SMS/800 services has been higher than that originally forecasted by Bellcore. Sprint's own demand for various SMS/800 services and facilities (e.g., 9.6 Kbps dedicated access lines) is greater than that assumed by Bellcore for ratemaking purposes,

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[9] On March 2, 1994, several of the BOCs filed an Application for Review of the Bureau's decision requiring them to disclose the CCSCIS model and data used to compute their 800 access rates. As explained in comments filed by Sprint and other parties on March 17, the reasons offered by the BOCs in support of their petition are unavailing and their application accordingly should be rejected. The issue of whether or not the CCSCIS model and data should be provided has been debated extensively in previously filed comments in this proceeding, and Sprint incorporates by reference its earlier pleadings rather than responding here again to the BOCs' claims about the confidential and proprietary nature of CCSCIS.

and Sprint believes that this may be true for other resporgs as well.

The BOCs state (p. 22) that the SMS rates are intended to cover only its costs, and "did not include either profit or loss." Now that Bellcore has almost a year's worth of experience at providing interstate SMS/800 service pursuant to tariff, it should to perform the requisite analysis to determine whether rates need to be adjusted to account for "profit or loss." Such analysis should be made available to the Commission and other interested parties.

VI. CONCLUSION.

The BOCs and GTE have again failed to demonstrate that the rates and some of the terms and conditions governing their provision of interstate 800 database access are just and reasonable. Sprint therefore urges the Commission to require these carriers to decrease their rates to reflect the removal of various costs from the exogenous cost category, adjust their demand forecasts as appropriate, and amend their terms and conditions as discussed above. In addition, Bellcore should use actual operating results to determine whether SMS rates should be decreased to remove any profits which such rates purportedly were not intended to generate.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Opposition to Direct Case" of Sprint Communications Company L.P. was sent via first-class mail, postage prepaid, on this the 15th day of April, 1994, to the below-listed parties:

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